

REMARKS

This application has been carefully reviewed in light of the Office Action dated October 5, 2005. Claims 1 to 3, 5 to 12, 14 to 20, 22 to 29, 31 to 37, 39 to 46 and 48 to 59 are pending in the application, of which Claims 1, 10, 18, 27, 35, 44, 58 and 59 are independent. Reconsideration and further examination are respectfully requested.

Claims 1 to 3, 5 to 12, 14 to 20, 22 to 29, 31 to 37, 39 to 46 and 58 to 60 have been rejected under 35 U.S.C. § 103(a) over U.S. Patent No. 5,761,655 (Hoffman) in view of U.S. Patent No. 5,905,988 (Schwartz). Reconsideration and withdrawal of this rejection are respectfully requested.

Turning to specific claim language, amended independent Claim 1 is directed to an image managing apparatus for managing retrievable images. The apparatus includes: image storage means for storing a plurality of images; selecting means for selecting a single image from the plurality of images, wherein the single image includes a plurality of objects; input means for inputting management information for each of the plurality of objects within the single image, wherein the management information includes one or more words describing an interrelationship between one object with at least one other object and a position where the one object is placed in the single image; and memory means for storing the management information inputted by said input means in association with the single image.

In contrast to the foregoing, Hoffman describes a thumbnail image and indexing thereof. Referring specifically to Figure 9 of Hoffman (which is discussed in the Office Action at the paragraph bridging pages 9 and 10), Hoffman displays thumbnail images for viewing by a user, and further displays textual information in conjunction with the thumbnail images. It is Applicants' understanding, however, that this textual information is nothing more than the file name of the image, and is not "one or more words describing an interrelationship between one

object with at least one other object and a position where the one object is placed in the single image” as featured in Claim 1.

Furthermore, Schwartz discloses the use of accompanying text describing the contents of a picture. However, Schwartz discloses nothing about the feature of storing management information for each of the objects included in the image in association with the image.

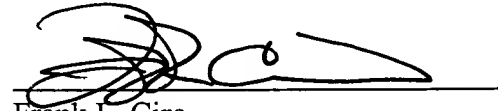
Claim 10 is directed to an image retrieving apparatus for retrieving images. The retrieving apparatus comprises image storage means for storing a plurality of images, wherein each image includes a plurality of objects; memory means for storing management information for each of a plurality of objects included in a single image in association with the single image, wherein the management information includes a word describing an interrelationship between one object with at least one other object; query input means for inputting query for retrieval, wherein the query includes at least one word; and retrieving means for retrieving an image including an object that meets the query inputted by said query input means, based on the management information stored in said memory means.

In contrast, Hoffman discloses the use of keyword searching, and beginning at column 11, Hoffman describes the use of a keyword database 422. These keywords are understood to be customizable by the user, and any keywords can be entered and searched. However, Hoffman fails to disclose a plurality of objects included in a single image in association with the single image and retrieving an image including an object that meets an input query based on stored management information. Furthermore, Schwartz discloses nothing regarding a retrieval feature similar to the retrieval features of Claim 10.

In light of the deficiencies of Hoffman and Schwartz as discussed above,
Applicants submit that, the entire application is believed to be in condition for allowance, and
such action is respectfully requested at the Examiner's earliest convenience.

Applicants' undersigned attorney may be reached in our Costa Mesa, CA office at
(714) 540-8700. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Frank L. Cire', is written over a horizontal line.

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